

**FULBRIGHT**  
*& Jaworski L.L.P.*  
Attorneys at Law

**Layne E. Kruse**  
*Partner*

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May 25, 2012

VIA ECF

Hon. Patty Shwartz, U.S.M.J.  
U.S. District Court, District of New Jersey  
50 Walnut Street  
Newark, New Jersey 07101

Re: *In re Insurance Brokerage Antitrust Litigation*, Civil No. 04-5184, MDL No. 1663

Dear Judge Shwartz:

I am an attorney of record for Defendant HCC Insurance Holdings Incorporated in the tag-along action under the above-referenced matter. In accordance with the Court's order of May 22, 2012, I submit declarations completed by all counsel of record for Defendant, attesting that we and our client agree to be bound by the September 23, 2005 Discovery Confidentiality Order.

Respectfully submitted,



Layne E. Kruse

LEK

cc: All Counsel of Record (via ECF)

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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IN RE: INSURANCE BROKERAGE  
ANTITRUST LITIGATION

MDL No. 1663  
Civil No. 04-5184 (FSH)

**APPLIES TO ALL ACTIONS**

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IN RE: EMPLOYEE-BENEFIT INSURANCE  
BROKERAGE ANTITRUST LITIGATION

Civil No. 05-1079(FSH)

**APPLIES TO ALL ACTIONS**

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**Exhibit A  
Declaration Concerning Material Covered by  
Discovery Confidentiality Order**

I, the undersigned, hereby declare that I have read the attached Discovery Confidentiality Order entered in the coordinated and consolidated actions before the District of New Jersey entitled In re: Insurance Brokerage Antitrust Litigation., Civil Action No. 04-5184 and In Re: Employee Benefit Insurance Brokerage Litigation, Civil No. 05-1079. I understand the terms of this Discovery Confidentiality Order.

I will comply with all of the provisions of the Discovery Confidentiality Order. I will hold in confidence, will not disclose to anyone not qualified under the Discovery Confidentiality Order, and will use only for the purposes expressly set forth in the Discovery Confidentiality Order, any Confidential Information or Attorneys' Eyes Only Information, including the substance and any copy, summary, abstract, excerpt, index, or description of such material that is disclosed to me. I agree to submit to the personal jurisdiction of the District of New Jersey in any proceeding related to the enforcement of this Discovery Confidentiality Order, including any proceedings related to contempt of Court. At the conclusion of my involvement in this matter, I agree to return all Confidential Information or Attorneys' Eyes Only Information which comes into my possession, and all documents and things that I have prepared relating thereto, to counsel from whom I received such materials.

I declare that the foregoing is true and correct. I understand that if any of the statements made by me are willfully false, I am subject to punishment.

Name of Individual: Layne E. Kruse

Present occupation/job description: Partner, Fulbright & Jaworski LLP

Name of Company or Firm: Fulbright & Jaworski LLP

Address: 1301 McKinney, Suite 5100, Houston, TX 77010

Telephone No.: 713-651-5151

Relationship to this action and its parties: Counsel for Defendant HCC

Insurance Holdings Incorporated

Dated: May 25, 2012



Signature

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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**IN RE: INSURANCE BROKERAGE  
ANTITRUST LITIGATION**

**MDL No. 1663  
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Name of Individual: Felice Galant

Present occupation/job description: Senior Counsel, Fulbright & Jaworski LLP

Name of Company or Firm: Fulbright & Jaworski LLP

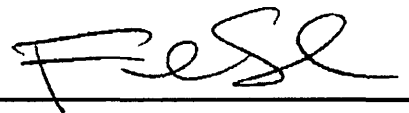
Address: 666 Fifth Avenue, New York, NY 10103

Telephone No.: 212-318-3000

Relationship to this action and its parties: Counsel for Defendant HCC

Insurance Holdings Incorporated

Dated: May 25, 2012

  
Signature